1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 9 MARY KARRER, 10 CASE NO.: 2:23-00991-JLR Plaintiff, 11 STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME VS. 12 TO SUBMIT INITIAL DISCLOSURES WALSH CONSTRUCTION COMPANY II 13 LLC et al., NOTE ON MOTION CALENDAR: AUGUST 25, 2023 14 Defendants. 15 I. **STIPULATION** 16 Pursuant to Local Rules 7(j) and 10(g), Plaintiff MARY KARRER, ("Plaintiff") and 17 Defendant WALSH CONSTRUCTION COMPANY II LLC, and WALSH CONSTRUCTION 18 GROUP, LLC ("Defendants") hereby respectfully submit this stipulated motion for an extension 19 of time to submit Initial Disclosures and Joint Status Report and Discovery Plan, in support 20 thereof, state as follows: 21 The following deadlines for initial disclosure and submission of the Joint Status 22 Report and Discovery Plan are in place: (1), Initial Disclosures Pursuant to FRCP 26(a)(1): 23 August 23, 2023; and (2) Combined Joint Status Report and Discovery Plan as Required by 24 FRCP 26(f) and Local Civil Rule 26(f): August 30, 2023. ECF No. 16. 25 26 GORDON REES SCULLY STIPULATION AND [PROPOSED] ORDER RE: EXTENSION OF TIME - 1

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- 2. The Parties held an initial conference on August 4, 2023 to discuss the issues that are the subject of the Joint Status Report. Counsel for the Parties have worked together many times and do not anticipate any unusual issues. The Parties have outlined already outlined a plan to create the Joint Status Report, but need a little more time to produce documents and create the report.
- 3. As such, in light of the above and subject to Court approval, the Parties stipulate and agree, subject to Court approval, that the deadlines for initial disclosure and submission of the Joint Status Report and Discovery Plan be extended as follows: (1) Initial Disclosures Pursuant to FRCP 26(a)(1): September 8, 2023; and (2) Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f): September 15, 2023.

WHEREFORE, the Parties respectfully request that this stipulated motion be granted and that the deadlines for initial disclosure and submission of the Joint Status Report and Discovery Plan be extended as follows: (1), Initial Disclosures Pursuant to FRCP 26(a)(1): September 8, 2023; and (2) Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f): September 15, 2023.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD on this 25th day of August, 2023.

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STIPULATION AND [PROPOSED] ORDER RE: EXTENSION OF TIME - 2 NO. 2:23-cv-00991-JLR GORDON REES SCULLY MANSUKHANI, LLP

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ORDER It is so ORDERED: The deadlines for initial disclosure and submission of the Joint Status Report and Discovery Plan per ECF No. 43 are extended as follows: (1) Initial Disclosures Pursuant to FRCP 26(a)(1): September 8, 2023; and (2) Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f): September 15, 2023. Dated this 28th day of August, 2023. m R. Plut HONORABLE JAMES L. ROBART GORDON REES SCULLY

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